

UNITED STATES DISTRICT COURT

for the
Southern District of Ohio

FILED
RICHARD W. NAGEL
CLERK OF COURT

5/29/25

U.S. DISTRICT COURT
SOUTHERN DIST. OHIO
WEST. DIV. DAYTON

In the Matter of the Search of
(Briefly describe the property to be searched
or identify the person by name and address)

UNITED PARCEL SERVICE (UPS) THREE DAY
SELECT PACKAGE WITH TRACKING NUMBER

Case No. 3:25-mj-237

APPLICATION FOR A WARRANT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

USP parcel with tracking number [REDACTED] addressed to [REDACTED] Dayton, Ohio 45416
with a sender of [REDACTED] The UPS Store #5575, Unit E, 2851 W 120th Street, Hawthorne, CA 90250
located in the Southern District of Ohio, there is now concealed (identify the person or describe the property to be seized):

controlled substances, proceeds of drug trafficking activity, as well as packaging material that may contain fingerprints, genetic information of the sender, or packaging that may be like and similar to that found in other drug parcels intercepted by law enforcement

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;
☒ contraband, fruits of crime, or other items illegally possessed;
☒ property designed for use, intended for use, or used in committing a crime;
☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section	Offense Description
21 U.S.C. 841(a)(1)	Distribution and possession with intent to distribute a controlled substance
21 U.S.C. 846	Conspiracy to distribute/possess with intent to distribute a controlled substance
21 U.S.C. 843(b)	Use of a communication facility to commit a felony

The application is based on these facts:

SEE ATTACHED AFFIDAVIT

- ☒ Continued on the attached sheet.
☐ Delayed notice of _____ days (give exact ending date if more than 30 days: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

Jordan Gula
Applicant's signature

Jordan Gula, FBI Special Agent
Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by
Telephone _____ (specify reliable electronic means).

Date: 5/29/25

City and state: Dayton, Ohio

Peter B. Silvain, Jr.
Peter B. Silvain, Jr.
United States Magistrate Judge



UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

IN THE MATTER OF THE SEARCH OF:
UNITED PARCEL SERVICE (UPS)
THREE DAY SELECT
PACKAGE WITH TRACKING NUMBER
[REDACTED]

3:25-mj-237

Case No. _____

Filed Under Seal

AFFIDAVIT IN SUPPORT OF
AN APPLICATION FOR A SEARCH WARRANT

I, **Jordan D. Gula**, being first duly sworn, hereby depose and state as follows:

1. I, Special Agent Jordan D. Gula, am employed by the Federal Bureau of Investigation and have been since January 2016. As a Special Agent by the Federal Bureau of Investigation (FBI), I am currently assigned to the FBI's Southwest Ohio Safe Streets Task Force which investigates violent crime matters including criminal enterprise activities, incidents impacting interstate commerce, commercial and home invasion style robberies, carjackings, kidnappings, and assaults on Federal Officers. I have participated in numerous drug investigations involving violations of federal, state, and local laws, including investigations of multi-national criminal organizations, firearms violations, and drug trafficking violations. I have extensive prior experience in investigating drug cases that resulted in successful prosecution of persons involved in trafficking of drugs, possession of drugs and other related offenses. I have been involved in narcotics related arrests, executed search warrants that resulted in the seizure of narcotics and participated in undercover narcotics purchases. Through training and experience, I am familiar with the way persons involved in the illicit distribution and sales of controlled substances often operate. These subjects usually attempt to conceal their identities, the locations at which they

reside, where they store controlled substances, and the illegal proceeds derived from the sale of controlled substances.

2. Based on my prior training and experience as a Special Agent of the FBI, I have become aware that drug traffickers frequently use overnight or priority mail and parcel services to transport drugs and/or proceeds. Additionally, because of my prior investigations, law enforcement training, experience of other involved law enforcement investigators, and successful controlled-substance prosecutions involving use of the parcel delivery services, I have learned of certain common characteristics and/or circumstances that indicate a particular package may contain Drugs and/or Proceeds. These circumstances and/or characteristics include, but are not necessarily limited to, the following: the shipper uses different post offices on the same day to send packages, the return address is false or non-existent, the addressee is not known to receive mail at the listed delivery address, the package is heavily taped, the package is mailed from a known drug source location, the labeling information contains misspellings, the label contains an illegible waiver signature, unusual odors emanate from the package, and the listed address is located in an area of known or suspected drug activity.

3. On May 27, 2025, UPS allowed the FBI Safe Streets Task Force (SSTF) to be present in its facility at the UPS Customer Center in West Carrollton, Ohio. During that visit, FBI lawfully discovered a package (hereinafter “The Package”) at this location.

4. The Package was a brown box with tracking number [REDACTED] and weighing approximately 25 pounds. Shipping information from UPS revealed that the Package was sent on May 21, 2025, from southern California via UPS 3 Day Select. The Package contained the following sender and recipient information:

Sender:

[REDACTED]
[REDACTED]
The UPS Store
2851 W 120th Street, Unit E
Hawthorne, CA 90250

Addressee:

[REDACTED]
[REDACTED]
[REDACTED]

Through training and experience as a Special Agent with the FBI, I know that Southern California has been long known as source from which drugs are supplied to the Midwest, including Ohio. Additionally, I am aware of multiple ongoing state and federal investigations into drug trafficking organizations in Southern California who use UPS as a mechanism to distribute illegal drugs around the United States.

5. Law enforcement performed a check in ACCURINT for the recipient's information listed on The Package: [REDACTED] ACCURINT is a law enforcement database that is used as a tool for investigators to identify persons/businesses and associated address information. According to ACCURINT, there is no [REDACTED] associated with either [REDACTED] or any other address in Montgomery County, Ohio.

6. Law enforcement performed a check in ACCURINT for the sender's information listed on The Package: [REDACTED] The UPS Store #5575, Unit E, 2851 W

120th Street, Hawthorne, CA 90250. ACCURINT confirmed that a UPS Store does exist at this address; however, there is no public record of a [REDACTED] at the address. Additionally, the phone number [REDACTED], when queried both through ACCURINT and open-source resources, does not resolve to the UPS Store #5575; in fact, it did not resolve to any apparent businesses.

7. On May 27, 2025, at the request of the SSTF, Montgomery County Sheriff's Office K9 Detective Tony Hutson conducted a narcotics-detection canine "free air" check of the outside of the Package. SSTF investigators were present during this check. Prior to conducting the "free air" check, the Package was placed in an outdoor area with multiple similar and like packages. Based on information from K9 Detective Hutson, "Hank" alerted positively for the presence or odor of a narcotic or other controlled substance exuding from the Package. "Hank" is a properly trained and certified narcotics-detection canine.

8. Based on my law enforcement training and experience as a Special Agent of the FBI, the Package's address information (including the absence of a person identified as the recipient at the recipient address), the positive alert of the narcotics-detection canine, and the Package's shipment from a known drug source location via UPS are all indicative of and consistent with drugs and/or drug proceeds being present in the Package.

Therefore, a search warrant to open The Package is requested to search it for controlled substances, proceeds of drug trafficking activity, as well as packaging material that may contain fingerprints, genetic information of the sender, or packaging that may be like and similar to that found in other drug parcels intercepted by law enforcement.

Further, your affiant sayeth naught.

Respectfully submitted,

Jordan D. Gula

Jordan D. Gula
Special Agent
Federal Bureau of Investigation

Sworn to before me on May 29, 2025


Peter B. Silvain, Jr.
United States Magistrate Judge

